

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

FLAME S.A.	§	
	§	
Plaintiff,	§	
	§	
V.	§	C.A. No. <u>10-cv-00278-RC</u>
	§	IN ADMIRALTY, Rule E
m/v LYNX, her engines, freights, apparel, appurtenances, tackle, etc., in rem	§	
	§	
Defendant.	§	

NOTICE OF EMERGENCY MOTION TO VACATE

PLEASE TAKE NOTICE that upon the attached Memorandum of Law in Support and the Declarations of Ioannis Vekris and Evangelos Hahos, specially appearing non-party claimant, CAMELA NAVIGATION INC., will move this Court, before the Honorable Ron Clark, in Courtroom ___, United States District Court, Eastern District of Texas, United States Courthouse, 300 Willow Street, Suite 221, Beaumont, Texas 77701, at a date and time to be determined by the Court, for an Order: (i) vacating the Rule C Order granting a warrant of arrest of the M/T LYNX; (ii) dismissing the complaint in its entirety; (iii) granting CAMELA NAVIGATION its costs and expenses, including reasonable attorneys' fees, in this proceeding; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: Oyster Bay, New York
May 16, 2010

Respectfully submitted,

CHALOS & CO, P.C.
Attorneys for Claimant
CAMELA NAVIGATION INC.

By: /s/ George M. Chalos
George M. Chalos (GC-8693)
123 South Street
Oyster Bay, New York 11771
Tel: (516) 714-4300
Fax: (516) 750-9051
E-mail: gmc@chaloslaw.com

BY: /s/ George A. Gaitas
George A. Gaitas
State Bar No. 24058885
CHALOS & Co, P.C.
675 Bering Drive, Suite 275
Houston, Texas 77057
Tel: +1 713 936 2427
Fax: +1 516 750 9051
E-mail: gaitas@chaloslaw.com

BENCKENSTEIN & OXFORD, L.L.P.

BY: /s/ Alan G. Sampson
Alan G. Sampson
State Bar No. 17560000
Hubert Oxford III
State Bar No. 15392000
Joshua C. Heinz
State Bar No. 24053264
P.O. Drawer 150
Beaumont, Texas 77704-0150
Ph. (409) 833-9182
Fax. (409) 833-8819
E-mail: asampson@benoxford.com

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2010, a true and correct copy of the foregoing has been served on all counsel of record through electronic transmission, the Case Management/Electronic Case File (CM/ECF) System for the USDC, EDTx which will send notification of such filing(s) to the following:

Michael K. Eaves, Esq.
meaves@calvert-eaves.com

I hereby certify that on May 16, 2010 I have provided a true and correct copy of the foregoing by electronic mail and by depositing same with the U.S. Postal Service, properly addressed, certified mail, on this 16th day of May, 2010 to the following non-registered participant:

William R. Bennett, III, Esq.
Bennett, Giuliano, McDonnell & Perrone, LLP
494 Eighth Avenue, 7th Floor
New York, New York 10122
wbennett@bgmplaw.com

/s/ George M. Chalos
George M. Chalos (GC-8693)